

Thomas R. Kreller (*pro hac vice admission pending*)  
Eric R. Reimer (*pro hac vice admission pending*)  
MILBANK, TWEED, HADLEY & McCLOY LLP  
2029 Century Park East, 33<sup>rd</sup> Floor  
Los Angeles, CA 90067  
Telephone: (424) 386-4000

Craig M. Price  
MILBANK, TWEED, HADLEY & McCLOY LLP  
28 Liberty Street  
New York, New York 10005-1413  
Telephone: (212) 530-5000  
Facsimile: (212) 530-5219

*Counsel to Cyrus Capital Partners, L.P.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

_____	)	Chapter 11
In re:	)	
	)	Case No. 18-23538 (RDD)
SEARS HOLDINGS CORPORATION, <i>et al.</i> ,	)	
	)	(Jointly Administered)
Debtors.	)	
_____	)	

**MOTION FOR ADMISSION TO PRACTICE, *PRO HAC VICE***

I, Thomas R. Kreller, request admission, *pro hac vice*, before the Honorable Robert D. Drain, United States Bankruptcy Judge, to represent Cyrus Capital Partners, L.P. in the above-referenced case.

I certify that I am a member in good standing before the bars of the State of California, the Central, Eastern, Northern and Southern Districts of California, and the Ninth Circuit Court of Appeals.

I have submitted the filing fee of \$200.00 with this motion for *pro hac vice* admission.

Dated: November 14, 2018  
Los Angeles, CA

**MILBANK, TWEED, HADLEY & M'CLOY LLP**

By: /s/ Thomas R. Kreller

Thomas R. Kreller  
2029 Century Park East, 33<sup>rd</sup> Floor  
Los Angeles, CA 90067  
Telephone: (424) 386-4000  
Email: TKreller@milbank.com

*Counsel to Cyrus Capital Partners, L.P.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

_____	)	Chapter 11
In re:	)	
	)	Case No. 18-23538 (RDD)
SEARS HOLDINGS CORPORATION, <i>et al.</i> ,	)	
	)	(Jointly Administered)
Debtors.	)	
_____	)	

**ORDER GRANTING ADMISSION TO PRACTICE  
PRO HAC VICE OF THOMAS R. KRELLER**

Upon the motion of Thomas R. Kreller to be admitted, *pro hac vice*, to represent Cyrus Capital Partners in the above-referenced case, and upon the movant's certification that the movant is in good standing in the bars of the State of California, the Central, Eastern, Northern and Southern Districts of California, and the Ninth Circuit Court of Appeals., it is hereby

**ORDERED**, that Thomas R. Kreller, is admitted to practice, *pro hac vice*, in the above-captioned chapter 11 case to represent Cyrus Capital Partners L.P. in the United States Bankruptcy Court for the Southern District of New York, provided that the filing fee has been paid.

Dated: New York, New York  
November \_\_\_, 2018

\_\_\_\_\_  
HONORABLE ROBERT D. DRAIN  
UNITED STATES BANKRUPTCY JUDGE